

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTSFILED
CLERKS OFFICE

2006 AUG 17 A 8:27

 BETTY ANNE WATERS, as
 Administratrix of the Estate of
 KENNETH WATERS,
 Plaintiff,

v.

 TOWN OF AYER, NANCY TAYLOR-
 HARRIS, in her individual capacity,
 ARTHUR BOISSEAU, in his individual
 capacity, BUDDY DECOT, in his
 individual capacity, WILLIAM
 ADAMSON, in his individual capacity,
 PHILIP L. CONNORS, in his individual
 capacity, and JOHN DOE and JANE DOES
 1-16, in their individual capacities,

Defendants.

Case No. 04 10521 (GAO)

LOCAL RULE 7.2
MOTION TO IMPOUND
DOCUMENTS

Pursuant to Local Rule 7.2, Plaintiff Betty Anne Waters, by counsel, respectfully moves that the enclosed documents, her Motion to Compel the production of documents from the Middlesex County District Attorney's file in the investigation and prosecution of Kenneth Waters for the murder of Katherina Brow, as well as Exhibits B and C thereto, be impounded until further order of the Court. Good cause exists for impounding these exhibits. The motion and correspondence (Exhibit B) quote from documents governed by paragraph 5(a) of the Court's protective order of September 26, 2005 (Docket No. 42), and Exhibit C includes actual documents provisionally produced by the DA's Office under various claims of privilege.

Respectfully submitted,

Dated: August 16, 2006
New York, NY

BETTY ANNE WATERS

By: 

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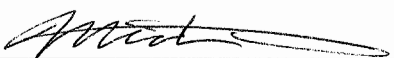
PROOF OF SERVICE

I, Micah West, being over eighteen years of age, hereby certify pursuant to the laws of the Commonwealth of Massachusetts that I served the following persons copies of this motion to impound by UPS Next Day Mail, this 16th day of August, 2006.

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Micah West